



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

October 9, 2020

**By ECF and Email**

The Honorable Denise L. Cote  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: **United States v. Joel Cabrera,**  
**No. 20 Cr. 172 (DLC)**  
**No. 20 Cr. 388 (DLC)**

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|-----------------------|
| USDC SDNY             |
| DOCUMENT              |
| ELECTRONICALLY FILED  |
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Dear Judge Cote:

The Government respectfully requests, with the consent of Joel Cabrera, the defendant, that the Court consolidate for trial the two above-referenced cases pursuant to Federal Rule of Criminal Procedure 13.

The parties request such consolidation without prejudice to either party making a future application to bifurcate Count One in information number 20 Cr. 172, charging the defendant with being a felon in possession of ammunition, from the counts set forth in indictment number 20 Cr. 388.

Respectfully submitted,

AUDREY STRAUSS  
Acting United States Attorney

by: /s/ \_\_\_\_\_  
Daniel H. Wolf / Alexander N. Li  
Assistant United States Attorneys  
(212) 637-2337 / -2265

cc: Robert Osuna, Esq. (counsel to Joel Cabrera)

*Granted.*  
*Denise Cote*  
*Oct. 9, 2020*

MEMO ENDORSED